

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

IN RE UNITEDHEALTH GROUP  
INCORPORATED SHAREHOLDER  
DERIVATIVE LITIGATION

Master File No. 06-1216 JMR/FLN

**LEAD PLAINTIFFS' NOTICE OF MOTION FOR FINAL APPROVAL  
OF SETTLEMENT OF DERIVATIVE ACTION AND FOR  
APPROVAL OF AWARD OF ATTORNEYS' FEES AND  
REIMBURSEMENT OF LITIGATION EXPENSES**

PLEASE TAKE NOTICE that Lead Plaintiffs Public Employees' Retirement System of Ohio, State Teachers' Retirement System of Ohio, St. Paul Teachers' Retirement Fund Association, Public Employees' Retirement System of Mississippi, Jacksonville Police & Fire Pension Fund, Louisiana Municipal Police Employees' Retirement System, Louisiana Sheriffs' Pension & Relief Fund, Fire & Police Pension Association of Colorado, Connecticut Retirement Plans and Trust Funds, and Jan Brandin ("Lead Plaintiffs"), by their undersigned counsel, will bring a Motion on February 13, 2009 at 11:00 a.m. before the Honorable James M. Rosenbaum in the U.S. District Court, Courtroom 14E, Minneapolis, Minnesota, seeking the entry of an Order as detailed in the accompanying Motion. The SLC joins Lead Plaintiffs in the Motion to Approve the Settlement.

Dated: January 30, 2009

**CHESTNUT & CAMBRONNE, P.A.**

By /s/ Karl L. Cambronne

Karl L. Cambronne #14321  
Jack L. Chestnut #16378  
Jeffrey D. Bores #227699  
3700 Campbell Mithun Tower  
222 South Ninth Street  
Minneapolis, MN 55402  
Telephone: (612) 339-7300  
Fax: (612) 336-2940

SHAPIRO HABER & URMY LLP

Thomas G. Shapiro  
Edward F. Haber  
Michelle H. Blauner  
53 State Street  
Boston, MA 02109  
Telephone: (617) 439-3939  
Fax: (617) 439-0134

BERNSTEIN LITOWITZ BERGER &  
GROSSMANN LLP

Chad Johnson  
Beata Farber  
Adam Wierzbowski  
1285 Avenue of the Americas  
New York, NY 10019  
Telephone: (212) 554-1400  
Fax: (212) 554-1444

GRANT & EISENHOFER P.A.

Jay W. Eisenhofer  
Michael Barry  
45 Rockefeller Center, 15<sup>th</sup> Floor  
New York, NY 10111  
Telephone: (646) 722-8500  
Fax: (646) 722-8501

RICE, MICHELS & WALTHER LLP

Brian Rice, #14468X  
Ann Walther, #21369X  
Karin E. Peterson, #185048  
206 East Bridge, Riverplace  
10 Second Street Northeast  
Minneapolis, MN 55413  
Telephone: (612) 676-2300  
Fax: (612) 676-2319

*Counsel for Lead Plaintiffs*

KLAUSNER & KAUFMAN, P.A.

Robert D. Klausner

10059 N.W. First Court

Plantation, FL 33323

Telephone: (954) 916-1202

Fax: (954) 916-1232

*Additional Counsel for Jacksonville Police  
& Fire Pension Fund and Louisiana  
Sheriffs' Pension & Relief Fund*